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Attorneys for Defendant  
DAVID COCHRAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND

DENISE TAVARES,

Plaintiff,

vs.

DAVID COCHRAN, in his official capacity  
as a County of Alameda Sheriff Deputy, and  
DOES 1-25, inclusive,

Defendants.

**CASE NO.: 4:20-cv-01704-HSG**

**STIPULATION AND ORDER  
MODIFYING CASE MANAGEMENT  
DEADLINES**

Ctrm: 2, 4<sup>th</sup> Floor  
Judge: Hon. Haywood S. Gilliam, Jr., Presiding

Date Action Filed: March 9, 2020  
Trial Date: June 28, 2021

WHEREAS the parties have been cooperating and working diligently on completing discovery including depositions of the parties and witnesses.

WHEREAS, certain depositions which the parties expect will be relied upon by experts were completed on December 16, 2020; however, transcripts have not yet been received.

WHEREAS, the deposition of one eyewitness, B.J. Coleman, was noticed well in advance of the fact discovery cutoff; however, that witness was reportedly out of state in December and not returning until mid-January, such that her deposition has not yet been completed.

WHEREAS the parties have agreed and stipulated to modify the Case Management

deadlines contained in the Scheduling Order filed on June 25, 2020 (Document #22). The current trial date of June 28, 2021 is not affected.

Pursuant to local rule 6-1 and 6-2 the parties stipulate and propose the following modifications to the Case Management deadlines:

EVENT	CURRENT DATE	PROPOSED DATE
Exchange of Opening Expert Reports	January 8, 2021	January 22, 2021
Exchange Rebuttal Expert Reports	January 22, 2021	February 5, 2021
Close of Expert Discovery	February 8, 2021	February 22, 2021

Additionally, the parties agree that fact discovery may remain open, but only for purposes of completing the deposition of eyewitness, B.J. Coleman.

It is so stipulated.

Dated: January 8, 2021

POINTER & BUELNA, LLP  
LAWYERS FOR THE PEOPLE

By /s/ Patrick M. Buelna  
Patrick M. Buelna, Esq.  
Counsel for Plaintiff

Dated: January 8, 2021


EDRINGTON, SCHIRMER & MURPHY LLP

By /s/ Timothy P. Murphy  
Timothy P. Murphy, Esq.  
Attorney for Defendant  
DAVID COCHRAN

### **ORDER**

Good cause appearing, it is so ordered.

DATED: 1/12/2021

By:   
HON. HAYWOOD S. GILLIAM, JR.  
United States District Court Judge